

Applicants have amended claim 1 to incorporate the limitations of dependent claim 9 to clarify that the “generally central region” is between the brake booster and the vehicle centerline (and its symmetrical region on the other side of the centerline). Claim 9 has been cancelled without prejudice to the subject matter contained therein. Claims 1-8 remain pending in the present Application. The Applicants have attached hereto a proposed drawing change to add a “PRIOR ART” label to Fig. 7 in accordance with the Examiner’s helpful suggestion. Finally, the Applicants have amended the specification to explicitly state that the foreign applications have been incorporated by reference for priority claiming purposes.

In view of the foregoing amendments and the following remarks, the Applicants respectfully request the pending rejections and objections be withdrawn, and allowance of claims 1-8.

1. Claims 1-2 and 8 Are Allowable Over The Haynes Taurus Manual.

The Applicants respectfully traverse the pending § 102(b) rejection of claim 1 and dependent claims 2 and 8 on the grounds that the Haynes Taurus Manual does not disclose or suggest all the features for which it is cited.

The present invention as recited in claim 1 requires, *inter alia*, the concentration within a central region of “at least two electrical equipments selected from an engine control computer, a relay block, a junction box, an ABS actuator, and a meter unit.”

As a threshold matter, the September 26, 2001 Office Action cites Haynes Taurus Manual as disclosing that there is a relay block with a “power window relay integral with the fuse/junction block,” and that “the relay block and the junction box are concentrated in generally the same region.” Office Action at 5-6 (citing Haynes Taurus Manual page 12-3, Fig. 4.1 caption). The Applicants respectfully submit that the Ford and Mercury vehicles covered by the Haynes Taurus Manual do not have fuse boxes with an integral power window relay.

The only reference to power windows in conjunction with the fuse box in these vehicles is shown in Haynes Taurus Manual Fig. 4.2, wherein fuse number 6 in the fuse block is identified as supplying power to the power window relay. There is, however, nothing in Haynes Taurus Manual that discloses or suggests that the power window relay “are concentrated in generally the same region.” Close examination of the front and rear faces of this fuse box, which was widely used in the majority of domestically-produced Ford cars and light trucks in the 1980s’s and 1990’s, will reveal that there is no provision for mounting a power window relay thereon. This reference

therefore fails to disclose or suggest a “power window relay integral with the fuse/junction box,” and thus fails to disclose or suggest the features of claim 1 for which it is cited.

As to the remaining portions of the pending § 102(b) rejection, the September 26, 2001 Office Action identifies that the Haynes Taurus Manual discloses the components recited in claim 1, and then generally asserts that these disparate components are “concentrated” in the generally central region of the vehicle, which the Examiner broadly defines as the region “between the inner fender walls.”¹ Office Action at 3.

The Applicants respectfully submit that in view of the disclosure in the present Application, the Examiner has mis-read the specific claim limitation that the recited components be “concentrated” within the generally central region. The Examiner appears to have adopted an interpretation that of the term “concentrated” as referring to location within the space between the inner fender walls, *i.e.*, that if a component is *anywhere* within this large space (nearly the entire volume of the vehicle), then the component is “concentrated” therein. This is not an interpretation one of ordinary skill in the art would adopt on review of the present specification.

To the contrary, rather than reading claim 1 as reciting merely location within the space “between the inner fender walls,” one of ordinary skill would recognize that the specification teaches that the recited components are (i) within the generally central region *and* (ii) are concentrated *near one another*. See, *e.g.*, Application Fig. 2 (showing close central location of components). Thus, the Applicants respectfully submit that the discussion in the Office Action, identifying recited components as “concentrated” within the Taurus or Sable vehicles, is based on a use of the phrase “concentrated in said generally central region” that is inconsistent with the Applicant’s definition and use in the present Application.

Specifically, as the Office Action acknowledges at page 6, lines 18-19, “Taurus teaches all the claimed components of the invention, but not the specific locations of the various components.” In fact, the cited components are distributed in a variety of locations through the Taurus and Sable vehicles, and are not in any sense “*concentrated*” in a central region. For example, the engine control computer (“ECA”) is disclosed in the Haynes Taurus Manual as being located on the far

¹ The Applicants note that claim 1 has been amended for clarity to incorporate claim 9’s limitation that the central region be within a space whose outer width is defined by the location of the vehicle’s brake booster; this is a significantly narrower space than that defined by the “inner fender walls.”

right side of the passenger compartment, behind the right-hand-side-located glove box. This component is clearly not “concentrated” with the instrument cluster, which is located on the *left* side of the vehicle at the *top* of the dash panel, with the fuse box, which is located down *under* the left side of the dash (shown in Fig. 4.1 as adjacent to the foot-operated parking brake pedal), nor with the ABS actuator, which is not shown in the cited portions of the Haynes Taurus Manual, but is believed to be located in the engine compartment, toward the front of the left side of the Taurus and Sable vehicles. Indeed, none of these components is located in the Taurus or Sable vehicles near each other, let alone “concentrated” in a manner that minimizes wire length.

In view of the foregoing, the Applicants submit that the Haynes Taurus Manual does not disclose or suggest the present invention’s concentrated arrangement of the foregoing components in a central region of a vehicle, and thus does not anticipate the claim 1 or its dependent claims 2 and 8 under § 102(b). The Applicants respectfully request the pending § 102(b) rejection of claims 1-2 and 8 be reconsidered and withdrawn.

2. Claims 3-7 Are Patentable Over The Cited References Under § 103(a).

The Applicants respectfully traverse the pending § 103(a) rejections of claims 3-7 on the grounds that the Haynes Taurus Manual does not disclose or suggest all the features for which it is cited, and the remaining cited references cure the deficiencies of the Haynes Taurus Manual.

a. Claims 3-7 Are Patentable Over the Haynes Taurus Manual. As to the § 103(a) rejection of claims 3-7 as unpatentable over the Haynes Taurus Manual alone, the Examiner acknowledges that the Haynes Taurus Manual does not teach the specific locations of the various components, but asserts that it would have been obvious to locate the various components “close together in a generally central region of the engine compartment near the firewall” in order to reduce the length of a wiring harness. September 26, 2001 Office Action at 6-7. The Applicants respectfully submit that the Haynes Taurus Manual does not teach or suggest the concentrated co-location of components claimed in the present Application.

As noted in section 1, above, while the Haynes Taurus Manual refers to a variety of automotive components, there is nothing in this repair manual that teaches or suggests the concentration of components within a central region of the vehicle, as recited in the presently pending claims. This manual in fact teaches away from the present invention, as it shows widely dispersed component locations (and, as previously noted, does not show co-location of the fuse

box and the power window relay). Thus, the mere fact that all the recited components may be eventually located within the roughly 100 pages of the Haynes Taurus Manual is not an adequate substitute for some teaching or suggestion in this reference to concentrate these components together in a central region of the vehicle, let alone some suggestion in this reference that such concentration is either desirable or feasible. Accordingly, the Applicants respectfully submit that, in view of the lack of a teaching or suggestion in the direction of the present invention, the summary assertion of obviousness in the Office Action is unsupported.

b. Claims 3-5 Are Patentable Over the Haynes Taurus Manual and Toshihiro. In rejecting claims 3-5 over the Haynes Taurus Manual in view of Toshihiro, the September 26, 2001 Office Action summarily asserts that the Haynes Taurus Manual teaches the invention “substantially as claimed,” then focuses on Toshihiro’s disclosure of a relay box 10 co-located with a “joint box” 4.

Review of Fig. 1 of Toshihiro reveals, however, that this reference does not disclose or suggest the concentrated co-location of the components recited as recited in claim 1 (from which claims 3-5 depend) which, as noted above, the Haynes Taurus Manual fails to teach or suggest. Instead, Toshihiro focuses on a narrowly circumscribed portion of a vehicle’s cowl, showing only a small compartment containing relay box 10 piggy-backed on joint box 4. The Applicants respectfully submit that there is nothing in Toshihiro that teaches or suggests the concentrated arrangement of components the Haynes Taurus Manual fails to suggest. Accordingly, the Applicants respectfully submit that claims 3-5 are patentable over the combination of the Haynes Taurus Manual and Toshihiro under § 103(a).

c. Claims 6-7 Are Patentable Over the Haynes Taurus and Legacy Manuals. Claim 6 stands rejected under § 103(a) over the Haynes Taurus Manual alone, based on the assertion that it would have been obvious to mount the engine control computer in the engine compartment. As with the foregoing remarks concerning the § 103(a) rejections of claims 3-7, the Applicants respectfully reiterate that the Haynes Taurus Manual fails to teach or suggest the concentration of components recited in claim 1, from which claim 6 depends, and therefore claim 6 is patentable over this reference.

Similarly, the § 103(a) rejection of claim 7 over the Haynes Taurus Manual in view of the Haynes Legacy Manual is also flawed, inasmuch as the Haynes Legacy Manual fails to teach or suggest the present invention’s concentration of components, and thus fails to cure the defects of the

Haynes Taurus Manual. While, as the Office Action states, the Haynes Legacy Manual teaches that pre-1997 Subaru Legacy vehicles had ABS electronic modules “located in the dash,” there is nothing in Fig. 17.1 or the cited pages of the Manual that even hints where “in the dash” the module is located, let alone that it is located in a central region of the vehicle and concentrated with the other recited components. Indeed, “in the dash” covers the entire width of the vehicle, including the space outside the Examiner’s “inner fender walls” interpretation. The combination of the Haynes Taurus and Legacy Manuals therefore do not teach or suggest the invention recited in dependent claim 7, and this claim is patentable over these references under § 103(a).

3. Examiner Approval of A Drawing Change Is Requested.

In accordance with the Examiner’s helpful suggestion, the Applicants have attached hereto a proposed drawing change in red ink to add the label “PRIOR ART” to Fig. 7. Examiner approval of the proposed drawing change is respectfully requested. The Applicants will submit a revised formal drawing with the as-approved change following receipt of a Notice of Allowance in this Application.

4. The Specification Has Been Amended to Address Incorporation By Reference.

The Specification stands objected to for incorporation of essential material by reference to foreign applications, and the Applicant is required by the September 26, 2001 Office Action to amend the disclosure to include this material therein. The Applicant respectfully traverses this objection.

Manual of Patent Examining Procedure (MPEP) Section 608.01(p), subsection B, permits incorporation by reference to foreign documents for priority claiming purposes, without inclusion of the entirety of the text of said references in the present application. Accordingly, the Applicants have amended the specification to explicitly identify that the incorporation by reference is “for purposes of claiming priority thereto.” The Applicants respectfully request the pending objection to the specification be withdrawn.

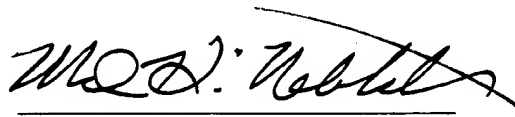
Conclusion

In view of the foregoing remarks, it is respectfully submitted that claims 1-8 are presently in condition for allowance. The Applicants therefore earnestly solicit an early and favorable action on the merits and issuance of a Notice of Allowance for these claims.

The Examiner is invited to contact the undersigned at (202) 220-4232 to discuss any matter concerning this application.

The Office is authorized to charge any underpayment or credit any overpayment to Kenyon & Kenyon Deposit Account No. 11-0600.

Respectfully submitted,



Mark H. Neblett
Registration No. 42,028

Dated: January 16, 2002

KENYON & KENYON
1500 K Street, N.W., Suite 700
Washington, D.C. 20005-1247
(202) 220-4200 (telephone)
(202) 220-4201 (facsimile)

MARKED-UP VERSION OF AMENDMENTS

IN THE SPECIFICATION:

Page 1, first paragraph:

The disclosures of Japanese Patent Applications No. 11-296179 filed on October 19, 1999 and No. 2000-220328 filed on July 21, 2000 including the specification, drawings and abstract are incorporated herein by reference in [its] their entirety for purposes of claiming priority thereto.

IN THE CLAIMS:

1. (Once amended) A structure in which a plurality of electrical equipments are arranged in a motor vehicle, comprising:

at least two electrical equipments selected from an engine control computer, a relay block, a junction box, an ABS actuator, and a meter unit; and

a vehicle body that defines a space including a generally centralized region as viewed in a direction of the width of the vehicle,

wherein said at least two electrical equipments are concentrated in said generally central region of the space defined by the vehicle body, and

further wherein said generally central region of the space defined by the vehicle body comprises a first region that is closer in the vehicle width direction to a longitudinal centerline of the vehicle than a position at which a brake booster is located, and a second region that is symmetrical with said first region with respect to said vehicle centerline.